

[COUNSEL LISTED ON SIGNATURE PAGE]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NATIONAL ABORTION FEDERATION (NAF),

Plaintiff,

v.

THE CENTER FOR MEDICAL PROGRESS,
BIOMAX PROCUREMENT SERVICES LLC,
DAVID DALEIDEN (aka "ROBERT SARKIS"),
and TROY NEWMAN,

Defendants.

Case No. 3:15-cv-3522

Judge: Hon. William H. Orrick, III

**STIPULATION AND
[PROPOSED] ORDER
CLARIFYING FILING
DEADLINE FOR
RESPONSIVE PLEADING**

Date Action Filed: July 31, 2015
Trial Date:

Pursuant to Local Rule 7-12, Defendants Center for Medical Progress, Biomax Procurement Services, LLC, David Daleiden and Troy Newman (“Defendants”) and Plaintiff National Abortion Federation file this stipulation.

WHEREAS, on September 18, 2015, Plaintiff filed its First Amended Complaint in this action;

WHEREAS, on September 28, 2015, this Court entered a minute order stating that “responses to the Amended Complaint (whether answers or Rule 12 motions) will be due 21 days following the Court’s Order on the motion for preliminary injunction.” and

WHEREAS, Defendants may wish to file a motion to strike pursuant to California Code of Civil Procedure section 425.16, which motion will, absent court order, be due on November 17, 2015;

NOW THEREFORE, IT IS AGREED AND STIPULATED, subject to the Court’s approval, that this Court’s order setting a due date of 21 days following the Court’s Order on the motion for preliminary injunction for the filing of responses includes the filing of a motion to strike under California Code of Civil Procedure section 425.16.

Dated: November 5, 2015

/s/ Derek F. Foran

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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: November __, 2015

Hon. William H. Orrick
United States District Judge

ATTESTATION OF E-FILED SIGNATURE

I, Catherine Short, am the ECF User whose ID and password are being used to file this STIPULATION REGARDING RESPONSIVE PLEADING PER SEPTEMBER 28th ORDER. In compliance with General Order 45, X.B., I hereby attest that Derek Foran, Steven Wood, and Erik Zimmerman concur in this filing.

Dated: November 11, 2015

/s/ Catherine Short
Catherine Short

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